UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Request for Concurrence on the Explanation of Significant Differences for the Remedial Action at the NL Industries/Taracorp Superfund Site, Granite City, Illinois

FROM: William Muno, Acting Director
Waste Management Division

Gail C. Ginsberg, Regional Counsel
Office of Regional Counsel

TO: Valdas V. Adamkus
Regional Administrator

By this memorandum we are recommending that you authorize the change in the remedial action at the NL Industries/Taracorp site by executing the attached Explanation of Significant Differences (ESD).

This ESD was prepared in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9601 et seq., the National Contingency Plan (40 CFR Part 300), and Agency Policy. We have reviewed the attached documents and have concluded that the ESD is both legally and technically sufficient. As such, we believe that the implementation of the remedial measure is a proper exercise of your delegated authority.

Please feel free to contact either one of us should you have any questions.

Concur

Valdas V. Adamkus
Regional Administrator 5/7/93.

Not Concur

Valdas V. Adamkus
Regional Administrator

EXPLANATION OF SIGNIFICANT DIFFERENCES
FOR THE
NL INDUSTRIES/TARACORP SITE
GRANITE CITY, ILLINOIS

INTRODUCTION

The purpose of this document is to provide a brief background for the NL Industries Site (NL Site or the Site), and explain how remedial activities will differ from the Remedial Action (RA) selected by the United States Environmental Protection Agency (U.S. EPA) in the Record of Decision (ROD) signed on March 30, 1990.

U.S. EPA, in cooperation with the U.S. Army Corps of Engineers, is currently conducting the remedial design (RD) for the Site. Groundwater samples collected during RD indicate that lead concentrations in monitoring wells downgradient from the Taracorp pile exceed applicable state and federal standards. This data indicates that the Taracorp pile may be the source of groundwater contamination.

In accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA), and consistent with Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), U.S. EPA has determined that the change to the remedy constitutes a significant change to the remedy required in the March 30, 1990 ROD. The change, however, is not a fundamental reconsideration of the basic remedy selection on which comment was taken. This presents U.S. EPA's Explanation of Significant Difference (ESD) for the Remedial Action at the NL Site.

This ESD and corresponding documents will become part of the NL Site's administrative record file and are available for public review. The administrative record is available at the following locations:

Granite City Public Library
2001 Delmar Avenue
Granite City, Illinois 62040

U.S. Environmental Protection Agency
Region V Records Center
77 W. Jackson Blvd. (7HJ)
Chicago, Illinois 60604
phone: (312) 886-0900

SUMMARY OF SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY

The NL Site, located in Granite City, Madison (including Eagle Park Acres), and Venice, Illinois, is the location of a former secondary lead smelting facility. Metal refining, fabricating, and associated activities have been conducted at the Site since the turn of the century. From 1903 to 1983 secondary lead smelting occurred on-site. Secondary lead smelting operations

were discontinued during 1983 and the equipment dismantled. Taracorp Industries, the current owner of the main industrial site, purchased the property from NL Industries, Inc., in 1979.

In July of 1981, St. Louis Lead Recyclers, Inc. (SLLR) began using equipment on adjacent property owned by Trust 454 to separate components of the Taracorp pile. The objective was to recycle lead-bearing materials to the furnaces at Taracorp and send hard rubber and plastic off-site for recycling. SLLR continued operations until March 1983 when it shut down its equipment. Residuals from the operation remain on Trust 454 property, as does some equipment.

A State Implementation Plan for Granite City was published in September 1983 by the Illinois Environmental Protection Agency (IEPA). The IEPA's Report indicated that the lead nonattainment problem for air emissions in Granite City was in large part attributable to emissions associated with the operation of the secondary lead smelter operated by Taracorp and lead reclamation activities conducted by SLLR. The IEPA procured Administrative Orders by Consent with Taracorp, St. Louis Lead Recyclers Inc., Stackorp, Inc., Tri-City Truck Plaza, Inc., and Trust 454 during March 1984. The Orders required the implementation of remedial-activities relative to the air quality.

The NL Site was listed on the National Priorities List, 40 C.F.R. Part 300 (NPL), on June 10, 1986. NL, as former owner of the Site, voluntarily entered into an Agreement and Administrative Order by Consent with the U.S. EPA and IEPA in May 1985 to implement a Remedial Investigation and Feasibility Study (RI/FS). The RI/FS was completed in January 1990.

The RI for the NL Site indicated the need to prevent direct contact with and inhalation of lead-contaminated soils and waste materials in the Taracorp pile, the SLLR piles, and the main industrial site; residential soils contaminated by lead fallout from the smelter stack; and battery case material used as fill material for alleys, driveways, and other areas. Additionally, the RI indicated a need for further ground water monitoring in the deeper zone of the upper aquifer and a mechanism for remediation of any contaminants in the ground water that are detected in concentrations that would present an endangerment to public health and the environment.

Different alternatives to address Site contamination were evaluated in the NL Feasibility Study and Addendum, and after detailed analysis of the alternatives, a Proposed Plan was issued. After taking into consideration all public comments, the Regional Administrator signed a Record of Decision on March 30, 1990. The remedy specified therein consisted of the following components:

- Installation of an upgraded security fence around the expanded Taracorp pile.

- Deed Restrictions and other institutional controls to ensure protection of the Taracorp pile.

- Performance of soil lead sampling to determine which areas must be excavated and the extent of the excavation.

- Inspection of alleys and driveways and areas containing surficial battery case material in Venice, Eagle Park Acres, Granite City, Madison and any other nearby communities to determine whether additional areas not identified in the Feasibility Study must be remediated as described below.

- Performance of blood lead sampling to provide the community with current data on potential acute health effects associated with Site contamination.

- Installation of a minimum of one upgradient and three downgradient deep wells, monitoring of ground water and air, and inspection and maintenance of the cap.

- Removal and recovery of all drums on the Taracorp pile at a secondary lead smelter.

- Consolidation of waste contained in adjacent St. Louis Lead Recyclers piles with the Taracorp pile.

- Excavation and consolidation with the Taracorp pile or off-Site disposal of battery case material from all applicable alleys and driveways in Granite City, Madison, and Venice, Illinois, and any other nearby communities.

- Excavation and consolidation with the Taracorp pile of all unpaved portions of the adjacent Trust 454, Rich Oil, and BV&G Transport properties with lead concentrations greater than 1000 ppm.

- Excavation and consolidation with the Taracorp pile or off-Site disposal of all residential soils and battery case materials in Granite City, Madison, and Venice, Illinois, and any other nearby communities with lead concentrations greater than 500 ppm.

- Inspection of the interiors of homes on property to be excavated to identify possible additional sources of lead exposure and recommend appropriate actions to minimize exposure.

- o Implementation of dust control measures during all remedial construction activities.

- o Construction of a RCRA-compliant, multi-media cap over the expanded Taracorp pile and a clay liner under all newly-created portions of the expanded Taracorp pile.

- o Development of contingency plans to provide remedial action in the event that the concentration of contaminants in ground water or lead or PM_{10} (particulate matter greater than 10 microns) in air exceed applicable standards or established action levels, or that waste materials or soils have become releasable to the air in the future.

- o Development of contingency measures to provide for sampling and removal of any soils within the zone of contamination described by the soil lead sampling to be implemented above with lead concentrations above 500 ppm which are presently capped by asphalt or other barriers but become exposed in the future due to land use changes or deterioration of the existing use.

Negotiations between the U.S. EPA and potentially responsible parties (PRPs) at the NL Site to design and construct the Site remedy failed. The U.S. EPA has sued certain PRPs to compel them to perform the Site remedy and to collect penalties for their failure to do so. U.S. EPA has commenced the RD for the NL Site and has planned an early action to remediate the highly lead-contaminated battery case material that was used as fill material and discovered in approximately 18 locations in the communities around the main industrial site.

The remedy outlined in the ROD included a requirement to excavate all soils and battery case materials in Granite City, Madison, and Venice, Illinois, and other nearby communities with lead concentrations greater than 500 parts per million (ppm) which pass a test used to measure the toxicity of hazardous substances,[1] and consolidate this material with the Taracorp slag pile on the main industrial property (Taracorp pile). Due to the high lead concentrations (up to 128,000 ppm) and accessibility to children of the battery case materials, U.S. EPA decided to proceed with remediation of battery case materials and

---

[1]The Toxicity Characteristic Leaching Procedure (TCLP) test will be used in evaluating the toxicity of hazardous materials. This test is required by the Resource Conservation and Recovery Act (RCRA). The TCLP test replaces the Extraction Procedure leach test (EP Toxic) previously required by RCRA and the ROD for this Site. This change is considered a non-significant change to the ROD.

associated soils from approximately 18 locations in Granite City, Venice, and Madison prior to the much larger remediation of residential soils in Granite City and Madison, also required by the ROD.

DESCRIPTION OF THE SIGNIFICANT DIFFERENCE AND THE BASIS FOR THE DIFFERENCE

As discussed above, this ESD pertains only to the disposal of battery case materials and associated soils in approximately 18 locations in Granite City, Venice, and Madison, Illinois which have lead concentrations greater than 500 ppm and pass the TCLP test (and therefore are not required to be sent to a RCRA regulated hazardous waste facility). The ROD initially required consolidation of this material with the Taracorp pile. This ESD will change this provision of the ROD by requiring the disposal of the material off-Site in a permitted landfill. The material will be stored on a liner in an industrial area on-Site until a permit is received from the State of Illinois to transport the material off-Site. It is anticipated that the permit will be received within 90 days of the start of the response action. Dust suppression techniques will be employed throughout the removal, storage, and transportation of the contaminated soil.

The primary basis for this ESD is groundwater samples taken during the RD. The groundwater data reveals that lead concentrations in monitoring wells downgradient from the Taracorp pile exceed applicable state and federal standards. This data indicates that the Taracorp pile may be the source of groundwater contamination and raises the possibility that the Taracorp pile may be recycled and/or disposed of off-Site.

In order to avoid the possibility of excavating the battery case material twice, U.S. EPA has determined that material from the 18 locations should be disposed of off-Site in a landfill. Samples of the battery case material taken during the remedial investigation indicate that less than half of the material excavated from these 18 locations will pass the TCLP test and, thus, would need to be consolidated with the Taracorp pile under the original ROD.

SUMMARY OF ANALYSIS OF NINE EVALUATION CRITERIA

1) Overall Protection of Human Health and the Environment

This remedy is protective of human health and the environment by removing for off-Site disposal contaminated material which presents a health risk.

2) Compliance with State and Federal Regulations (ARARs)

The changes required by this ESD comply with federal and state

requirements that were identified in the ROD as applicable or relevant and appropriate to this remedial action. Material not previously required by the ROD to be removed from the Site will be sent to a facility permitted to accept such wastes.

3) **Reduction of Toxicity, Mobility, or Volume Through Treatment**

This ESD will not alter any provisions in the original ROD regarding reductions of toxicity, mobility, or volume of contaminated materials through treatment.

4) **Short-Term Effectiveness**

Site activities involve excavation, staging and transportation to an off-Site disposal facility of lead contaminated waste. These activities present potential for short term exposure. Dust suppression techniques will be used. It is sound environmental practice to avoid handling lead contaminated materials any more than absolutely necessary to avoid possible increased fugitive dust emissions and a greater likelihood of transportation accidents. Although this ESD requires the material to be transported further than initially required in the ROD, this remedy eliminates the possibility of handling the same contaminated materials twice during Site remediation. During transportation to, and disposal at the off-Site disposal facility, proper handling procedures, and where appropriate, personal protection equipment and dust suppression techniques will also be employed.

5) **Long-Term Effectiveness**

The revised remedy utilizes permanent solutions to the maximum extent practicable for the Site. The U.S. EPA and IEPA believe that the remedy remains protective of human health and the environment.

6) **Implementability**

This remedy is readily implementable. Acceptance at a permitted landfill of battery case material and soils which pass the TCLP test is anticipated. Arrangements for staging the material prior to transportation have been made.

7) **Cost**

The initial additional cost of the disposal in a landfill versus consolidating with the Taracorp pile is approximately $200,000. This additional cost is justified due to the potential future cost savings of excavating and disposing of the battery case material a second time if the Taracorp pile is removed from the main industrial site. The savings is further increased because material which presently passes the TCLP test does not need to be

disposed of at a RCRA regulated hazardous waste facility. However, once the material is mixed with wastes in the Taracorp pile, which contains RCRA characteristic hazardous waste, the material may have to be disposed of at a hazardous waste facility. There is a significant increase in the cost of disposing of material at a hazardous waste facility.

8) State Acceptance

The Illinois Environmental Protection Agency has been given an opportunity to comment on this ESD and concurs with it.

9) Community Acceptance

The community commented on the possibility of removing or limiting the size of the Taracorp pile at the time of the ROD. Many members of the community expressed support for the removal of the Taracorp pile or limits on its size. The approach in this ESD is consistent with these views.

NL INDUSTRIES/TARACORP
UPDATE - ADMINISTRATIVE RECORD

PAGES	DATE	TITLE	AUTHOR	RECIPIENT
8	1992	"Sampling Artifacts and Potential Transport of Metal Colloids - San Fernando Valley Basin, California"	Wendell, Mayer Glanzman - CH_2 M Hill Mayer - U.S. EPA	N/A
55	1/20/93	Letter enclosing Illinois Groundwater Regulations	Brian Culnan Illinois EPA	Brad Bradley U.S. EPA
1	2/17/92	"Highlights - Robert S. Kerr Environmental Research 1992"	Dr. Bob P	
100+	11/92	"Supplemental Groundwater Investigation-NL/Taracorp Superfund Site - Granite City, Illinois	Woodward-Clyde Consultants	N/A
4	12/89	Exerpts from "Risk Assessment Guidance for Superfund - Volume I"	U.S. EPA	N/A
6	3/89	"Superfund Ground Water Issue - Ground Water Sampling for Metals Analyses"	Puls, Barcelona	N/A
3	10/14/92	Risk Assessment Teleconference for Superfund - Meeting Minutes (RATS)	U.S. EPA	N/A
5	11/7/91	Meeting Notes of RATS - 10/8/91	Sonich - Mullen U.S. EPA	Addressees (30)
10	1987	"Should Ground Water Samples from Monitoring Wells be Filtered Before Laboratory Analysis"	Various	N/A
2	4/23/90	"EPA Region III QA Directives"	N/A	N/A
100+	2/16/93	"Final Work Plan for Remediation of Locations in Granite City, Madison, and Venice, Illinois, Associated with NL Industries/ Taracorp Superfund Site"	OHM Corporation	N/A
80	3/29/90	55 Fed. Reg. 11798 "Hazardous Waste Management System; Identification and Listing of Hazardous Wastes; Toxicity Characteristics Revisions"	N/A	N/A
14	1992	"Metals in Groundwater: Sampling Artifacts and Reproducibility"	Puls, Clark, Bledsoe Powell, and Paul	N/A

NL INDUSTRIES/TARACORP
UPDATE - ADMINISTRATIVE RECORD

PAGES	DATE	TITLE	AUTHOR	RECIPIENT
2	7/31/92	"Filtered/Unfiltered Groundwater Analysis- Risk Assessment Perspectives"	Debra Forman U.S. EPA	Dick Willie U.S. EPA
13	April 1992	"Drinking Water Regulations and Health Advisories"	U.S. EPA	N/A
7	1992	"Suggested Modifications to Ground Water Sampling Procedures Based on Observations from the Colloidal Borescope	Kearly, Korte, and Cronk	N/A
11	1992	"Acquisition of Representative Groundwater Quality Samples for Metals"	Puls, Powell	N/A
2	December 1990	"Environmental Research Brief"	Puls, Eychaner, and Powell	N/A
12	July 1991	"Environmental Research Brief"	Puls, Powell Clark, and Paul	N/A
2	3/15/93	U.S. EPA/Illinois EPA Approval Letters for Final Work Plan for the Removal of Hard Rubber Battery Case Material	Bradley, Culnan	Jude Hobza U.S. ACE
2	3/10/93	Letter Enclosing Cost Differential Estimate	S.L. Carlock U.S. ACE	Bradley
7	12/9/91	Letter Regarding Ground Water Sampling for Metals	Wm. Turpin Ballard, U.S. EPA	Ron Lester WPAFB
8	1992	"Transport of Inorganic Colloids Through Natural Aquifer Material: Implications for Contaminant Transport"	Puls, Powell	N/A

SIERRA

April 6, 1993

Mr. Giulio Bonifacio
World Tee Industries, Inc.
308-1040 Hamilton St.
Vancouver, B.C. V6B 2R9
Canada

Re: Field Testing of Chemical Process to Stabilize Metal Contaminants in Soil and Wastes

Dear Mr. Bonifacio,

Three sets of field tests have been completed. In each case the test results have met expectations.

Specifically:

- extremely hazardous lead contaminated soil (650 parts per million leachable) was treated in accordance with the chemical formula provided. After treatment the soil tested at .74 ppm leachable lead, well under the EPA actionable limit of 5 ppm.

- chromium contaminated soil (11 ppm leachable) was treated in accordance with the chemical formula provided. After treatment the soil tested below detectable limit for leachable chromium, obviously well under the EPA actionable limit of 5 ppm.

- soil contaminated with both hydrocarbons (gasoline) and lead (7.2 ppm leachable lead) was treated. The leachable lead was reduced to .11 ppm, indicating the chemical reaction was not hindered by the presence of hydrocarbons.

The success of the test allows us to support your efforts in marketing the process. We have begun proposing to our clients that they consider this alternative for their soil remediation projects.

The ease of application along with the effectiveness of the treatment and the competitive price should allow rapid acceptance of the product into the environmental contracting industry. The market for remediation is growing which creates a corresponding demand for efficient solutions.

Additional reports will follow as time permits.

Sincerely,
SIERRA ENVIRONMENTAL INC.

Austin Marshall, P.E., P.G.
President

Quicksilver™ Product Safety Information

The *Quicksilver*™ formulation includes reagents which stabilize heavy metals in the contaminated soil and leave the soil with a balanced pH and biologic activity suitable for bacteria and plant life. Prior to mixing, the reagents in *Quicksilver*™ are considered as an irritation to the skin, eyes, and mouth and should not be taken internally. If such an event should happen, flush the affected area repeatedly with water. Gloves and breathing apparatus should be worn to avoid contact with the reagent into areas that could be affected.

Contractor Pricing

Volume pricing levels are based on contractor commitment as follows:

Category 1 - $85 per ton of contaminated soil - less than 1,000 tons annually.
Category 2 - $75 per ton of contaminated soil - 1,000 to 5,000 tons annually.
Category 3 - $65 per ton of contaminated soil - 10,000 tons annually.

In order to receive the lowest volume price per ton, a contractor must demonstrate evidence that such volume levels are reasonable and consistent with prior years levels. Specialty contractors who require additional compliance and handling may receive an additional charge.

Ongoing Tests and Support Data

World Tec will also provide an ongoing maintenance program whereby pulled samples from the site will be tested and recorded for EPA compliance purposes. This monitored information will be statistically acceptable to the compliance requirement that is part of the processing of test results for stability and ongoing health assurances. Soil testing will be monitored by World Tec before and after processing to assure quality control and compliance standards.

Representative Soil Samples

For each site, contractors will supply World Tec with a representative sample of the contaminated soil for testing of metal contamination, soil texture, pH levels, etc. The contractor will be billed for the TCLP tests and other tests that may be required. The TCLP tests will be passed with this sample. Upon confirmation of the TCLP test results, a request for *Quicksilver*™ formulation specific to the site requirements will be made.

Quicksilver™ Custom Mixing

Based on the information from the representative soil sample and the TCLP test results, World Tec will manufacture a *Quicksilver*™ custom formulation to the specific site soil and contamination requirements. A delivery schedule will be set at that time in coordination with the contractor cleanup plans.

Product Shipped FOB To Site

Freight and transportation costs will be borne by the contractor to the cleanup site from containerized truck(s) and or rail car(s) depending on the size of cleanup. World Tec will ship the *Quicksilver*™ reagents from Detroit, Michigan FOB at the outset. Additional transport sites are expected in the coming year.

Quicksilver™

Licensed Contractor Information Summary

Licensing Requirements

The following information must be on file with the Company:

- Signed non-disclosure agreement,
- Signed license agreement,
- An estimated volume purchase agreement and business plan, and
- Background information regarding experience and compliance with existing State & Federal regulations.

Equipment Requirements

Access to the following equipment is required:

- Excavating tools, backhoes, etc.,
- Crushing tools (for reducing soil size to less than 2 cm.),
- Conveyer system for moving soil through process,
- Pug mill or related soil mixing device, and
- Rotary kiln (for drying conditioned soil).

WORLD TEC INDUSTRIES, INC.
& EPS Environmental, Inc. 1-800-637-2668
INDUSTRIAL ENVIRONMENTAL TECHNOLOGY

Quicksilver™ Process Description

Contaminated soil is treated in five steps:

Step 1. Soil is removed by excavation to the treatment site where it is prepared by initial screening to remove coarse extraneous material such as large stones and wood. The excavated soil is crushed to reduce particle size to less than 2 cm. to assure maximum coverage of ***Quicksilver***™ reagents.

Step 2. The moisture content is determined, and water, in the form of steam, is added to increase the moisture content to 25-35% and to increase soil temperature.

Step 3. The conveyer system feeds the moistened soil and the ***Quicksilver***™ reagent into the pug mill for mixing.

Step 4. After the mixing process, the soil is conveyed into a rotary kiln for moisture removal and drying the conditioned soil.

Step 5. The treated soil is then returned to the excavation site.

Quicksilver™

"A major international environmental breakthrough"

New Product Announcement

World Tec Industries, Inc., ("World Tec") announces a new product called *Quicksilver*™ which will enable licensed and qualified contractors to carry out ex situ remediation of soils contaminated with heavy metals at substantial savings to customers. The new technology represents a major international breakthrough in environmental cleanup technology due to the following key benefits:

- *Quicksilver*™ is cost effective.

  *Product cleanup cost is **less than 50%** of the fees related to hazardous landfill tipping fees and transportation costs.*

- *Quicksilver*™ surpasses technical requirements.

  *Field tests confirm that soils contaminated with heavy metals successfully pass TCLP tests to the level where metals are **virtually undetectable**.*

Whether to reclaim ratable real estate or for compliance with EPA requirements, the ex-situ remediation of soils with *Quicksilver*™ provides significant benefits for contractors, business owners, buyers, bankers and nearby community residents.

WORLD TEC INDUSTRIES, INC.
& EPS Environmental, Inc. 1-800-637-2663
INDUSTRIAL ENVIRONMENTAL TECHNOLOGY

The Technology

In August 1992, World Tec announced a remediation process which had proven successful in bench tests treating soils contaminated with heavy metals so that the soils met the criteria for delisting. In January through March of 1993, the ongoing field tests further confirmed the lab results of the ***Quicksilver™*** technology.

"Contaminated soil with heavy metal levels in excess of 650,000 ppb were reduced to virtually undetectable levels of 750 ppb. (EPA minimum guidelines are 5,000 ppb).

Licensing Contractors

World Tec will be licensing contractors of the ***Quicksilver™*** product through-out the United States and Canada. These contractors have demonstrated evidence of volume tonnage and technical capability consistent with the objectives of the product usage. These contractors will receive preferred pricing based on volume requirements and training in the handling and followup requirements of the site for compliance purposes.

Individual Site Requirements

Contractors will supply World Tec with a representantive sample of the contaminated soil. The custom ***Quicksilver™*** compound will be formulated to suit the sample soil and contamination requirements. Successful TCLP tests and/or full RCRA scan tests using the custom ***Quicksilver™*** compound will initiate a delivery order for the product to be shipped FOB to the cleanup site in the quantities required.

WORLD TEC INDUSTRIES, INC.
& EPS Environmental, Inc. 1-800-637-2668
INDUSTRIAL ENVIRONMENTAL TECHNOLOGY

EPS U.S.A.

EPS ENVIRONMENTAL INCORPORATED

520 VICTOR STREET, SADDLE BROOK, NJ 07662 TEL: (201) 368-7902 FAX: (201) 368-8522

May 11, 1993

Mr. Brad Bradley
USEPA Region 5
Chicago, IL

Re: Granite City, Venice, IL.

Dear Mr.Bradley:

Thank you for returning my call yesterday, and your interest in our new technology. As we discussed, our interest will probably be in the stabilization of the slag pile. I would appreciate your reading of our overview and possibly some guidance in having our process reviewed for possible use on this site.

Yours Truly,

Leonard Train
VP Sales & Marketing

EPS U.S.A.

Transportation
Disposal and
Beneficial Re-Use
Remediation
Management

EPS U.S.A.

Tel: (201) 368-7902
Fax: (201) 368-8522

EPS ENVIRONMENTAL INC.
Environmental Management Specialists

LEONARD TRAIN
Vice President
Sales & Marketing

520 Victor Street
Saddle Brook, NJ 07662

EPS ENVIRONMENTAL INCORPORATED

Corporate Headquarters
520 Victor Street
Saddle Brook, New Jersey 07662

Telephone: 201 368-7902
Fax: 201 368-8522
1-800-MERCON-8